

SCHEDULE “W”

Holly Drinkle et al v. Concentra Trust et al, ABKB 1801-03538

(the “DIL Representative Action”)

COMBINED NOTICE PLAN (SECOND SETTLEMENT AND THIRD SETTLEMENT) PURSUANT TO THE COMBINED NOTICE APPROVAL ORDER (SECOND SETTLEMENT AND THIRD SETTLEMENT) PRONOUNCED ON APRIL 28, 2025

This Combined Notice Plan (Second Settlement and Third Settlement) will apply to the following notices provided for in the Second Settlement Agreement and Third Settlement Agreement, namely: the Combined Hearing Notice (Second Settlement and Third Settlement); and, if that relief is granted, the Combined Approval Notice (Second Settlement and Third Settlement”) (collectively the “Notices”).

1. The Plaintiffs will provide the Notices to all members of the DIL Representative Action Class either by: (a) e-mail for whom e-mail addresses are known; or (b) by mail at their respective last mailing addresses known to the Plaintiffs.
2. The Notices in generic form (not completed for addressee, share distribution amount or portal access code) will be promptly published on the class counsel’s website at www.smrlaw.ca.
3. Any other methods and the timing for issuance of the Notices shall be as stipulated by order(s) of the Court.
4. Subject to Court approval, the cost of issuing the Notices shall be paid by the DIL Creditors’ Subcommittee.
5. All capitalized groups of words in this Plan which are defined in the Second Settlement Agreement or Third Settlement Agreement or in the Combined Notice Approval Order (Second Settlement and Third Settlement) have the same definition in this Plan.